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OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

MEMORANDUM

SUBJECT: Authorization to Proceed with Remedial Planning Activities at the Insular Territories' Sites - Action Memorandum

FROM: William N. Hedeman, Jr., Director *Bill Hedeman*
Office of Emergency and Remedial Response (WH-548)

TO: Rita M. Lavelle, Assistant Administrator
for Solid Waste and Emergency Response (WH-562-A)

PURPOSE

The purpose of this memorandum is to request authorization to undertake remedial planning activities at four sites located on islands of the Insular Territories.

BACKGROUND

EPA's Interim National Priority List includes one highest priority site from each of these Territories: Ordot Landfill (Guam), Taputinu Farm (American Samoa), PCB Warehouse (Northern Mariana Islands), and PCB Wastes (Trust Territory of the Pacific Islands). CERCLA subsection 104(d)(4) provides that under certain circumstances non-contiguous facilities can be treated as one facility when such facilities are reasonably related on the basis of geography, or threat, or potential to the public health or welfare or the environment. Regional Counsel for Region IX believes, based on information on the sites, that the sites satisfy the requirements of subsection 104(d)(4) and recommends that they be treated as one facility. We concur in this recommendation. Because of the islands' distance from the mainland and the common problem of containerized waste, we recommend that the four sites be treated together for determining a solution to this particular problem.

The Insular Territories comprise a total land area of approximately 990 square miles with a population of about 262,000 persons. More than 2,000 islands are spread out over an area in excess of 7 million square

miles. Only a small percentage of the land area is permanently inhabited. The population is therefore much more densely distributed than would be expected, based on land area and total population.

The entire Insular Territories area is subject to climatological patterns vastly different from that of the mainland. Torrential rains and high winds, including typhoons, are not uncommon. The rainfall on some of the islands exceeds 200 inches per year. These climatic conditions require special procedures to protect the public health and the environment from stored hazardous wastes. Generally, the financial resources and topological and morphological conditions necessary for construction of safe disposal facilities in these areas are not available. The following are descriptions of the four sites:

a. Ordot Landfill, Guam

The Ordot landfill has been in use for over forty years. For most of its operational life, Ordot has been an open dump and there are no accurate records of what was disposed of at the landfill. Some of the wastes are containerized and stored in drums. The current landfill site occupies 47 acres and plans call for possible expansion to a total of 74 acres. The Territory is currently beginning to monitor the surface water surrounding the site. No groundwater monitoring has been undertaken.

b. Taputimu Farm, American Samoa

The island is small, approximately 25 miles by 3 miles, with a population of 32,000. The site is part of an agricultural experimental farm owned by the Territory and has been named by the Governor's designee as the "priority hazardous waste site" on American Samoa. The site consists of a warehouse, which has been used in excess of 10 years for the storage of unwanted, unused chemicals and pesticides. Many of the containers are leaking and have illegible markings or no labels. Known chemicals include the pesticides 2,4,5-T, dieldrin, methoxychlor, and sodium pentachlorophenate. It is estimated that approximately 2,000 pounds of hazardous waste are on-site. In addition to this, approximately 20 barrels of PCB waste fluid are on-site. The building regularly floods and the contents are washed downslope to a public beach. Contact with human beings, marine resources, and drinking water is likely.

c. PCB Warehouse, Northern Mariana Islands

The PCB warehouse is a temporary shelter built as an interim storage facility for approximately 1,400 gallons of PCB transformer fluid (concentration up to 25,000 ppm PCB). The structure was built as a first step to protect people and the environment from contamination by PCB's. The fluid is currently stored awaiting shipment to an off-island RCRA-permitted PCB disposal site. The storage site is adjacent to the Philippine Sea; which makes long-term storage unsafe. A similar nearby facility, which housed waste chemicals, was destroyed by typhoon Dinah in 1980. The potential for PCB contamination of drinking water and marine food resources, which the islands' inhabitants depend upon, is high in the event of another such incident.

d. PCB Wastes, Trust Territory of the Pacific Islands

These islands all contain areas of storage for PCB transformers and PCB contaminated transformers. In excess of 2,000 gallons of waste fluid are stored. The storage sites are unprotected and potentially may contaminate the ground and surface water. Contamination of the marine resources used for food can also be expected. Some of these sites are suspected of having already contaminated the surrounding areas.

ENFORCEMENT

Preliminary investigation has determined that each respective Territorial Government is solely responsible for the ownership and operation of the sites. None of these sites are a Section 111(e)(3) situation which prohibits EPA from spending Superfund dollars. However, at Ordot there possibly may be some DOD generated waste. In addition, there appear to be no responsible private parties, such as generators or transporters, in existence. A RCRA section 3007 letter dated December 10, 1981, requesting additional information from each Territory revealed no further information regarding other responsible parties. There is no history of Federal enforcement and none is planned at this time.

REQUIRED ACTIONS

We request that funding be provided for the A & E zone contractor to develop Comprehensive Action Plans covering the four Insular Territories' sites. The first action plan would focus on the remedy to the containerized waste problem. As part of this activity, the contractor will compile existing data from the Territorial Government files, evaluate the

data and recommend additional field work to supplement it. The contractor will also conduct any investigations the EPA decides are necessary to further quantify and identify the wastes for remedial removal and evaluate disposal alternatives for the containerized wastes.

To characterize the Ordot landfill where a problem with uncontained hazardous waste exists, we recommend a second action plan be implemented. We recommend this landfill be treated as a separate action because a potential groundwater problem exists due to the mixing of hazardous and solid wastes in the landfill. The first step will be to compile and evaluate existing data. This is the only investigation we are recommending at this time because very little is known concerning the extent and seriousness of contamination. The results of this initial study will provide information for the design of a field investigation should one be necessary. Two separate plans are also recommended because the solution for the containerized waste problem can probably be accelerated on a faster time schedule since the amount of field work required may be more limited than that for the Ordot problem.

Summary of Costs for Required Actions

1. Action to Remedy Containerized Waste Problems

o Compilation & Review of Existing Data & Identification of Necessary Field Work	\$15,000
o Completion of Necessary Field Work & Development of Remedial Alternatives	
- Sampling & Quantification of Wastes	23,000
- Development of Remedial Alternatives	7,000
Subtotal	<u>\$45,000</u>

2. Action to Characterize Problem at Ordot Landfill

o Compilation & Review of Existing Data	\$30,000
Subtotal	<u>\$30,000</u>
TOTAL	\$75,000

COST-SHARING

Section 501 of P.L. 95-134, and section 601 of P.L. 96-205, the Omnibus Territories Act, enable the Federal government to waive normal cost-sharing requirements for the Insular Territories. The Federal government must waive cost-sharing under \$100,000 for the Northern Mariana Islands and America Samoa. The Federal government may waive cost-sharing over \$100,000 for the Northern Mariana Islands and American Samoa. The Federal government also has discretion to waive the cost-sharing requirements for Guam and the Trust Territory of the Pacific Islands. By memoranda dated June 22, 1978, and January 18, 1979, signed by the Administrator, EPA, the authority to effect the waiver provided in section 501(d) was delegated to the Regional Administrator, Region IX. Therefore, the Regional Office intends to waive the cost-sharing provisions of CERCLA through the provisions of section 501 of the Omnibus Territories Act.

RECOMMENDATION

We recommend the authorization to proceed and use an estimated \$75,000 to fund the above remedial planning actions at the Insular Territories.

I am available to discuss this request in more detail at your convenience.

Approve

Rita M. Lavelle

Disapprove

Date

5/5/82